

Exhibit G

From: Alexander Truitt <truitt.a@wssl.com>
Sent: Monday, July 25, 2022 12:00 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; julianne.osborne@lw.com; SKYRYSEMOOG.LWTEAM@lw.com; Doug.Lumish@lw.com; Gabe.Gross@lw.com
Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; pmutu@hodgsonruss.com; tflynn@harrisbeach.com; Anthony Green <green.a@wssl.com>; Annabel Mireles <mireles.a@wssl.com>
Subject: RE: Moog/Skyryse - Third Party Subpoenas

Good Afternoon Everyone,

The Individual Defendants are considering Plaintiff's request. However, to understand Plaintiff's proposal, we would also need to know whether Plaintiff has produced documents, communications, information, etc. to government agencies that have not been produced in this action. Likewise, the extent there is any gap, we would also ask for Plaintiff to explain the basis for such gap.

Sincerely,

Alexander A. Truitt, Esq.

Associate

Winget, Spadafora & Schwartzberg, LLP
45 Broadway, 32nd Floor
New York, N.Y. 10006
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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Monday, July 25, 2022 2:44 PM

To: julianne.osborne@lw.com; SKYRYSEMOOG.LWTEAM@lw.com; Doug.Lumish@lw.com; Gabe.Gross@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; pmuto@hodgsonruss.com; tflynn@harrisbeach.com;

Anthony Green <green.a@wsslip.com>; Alexander Truitt <truitt.a@wsslip.com>

Subject: RE: Moog/Skyryse - Third Party Subpoenas

Juli:

Our position is that to the extent Skyryse has or will produce any documents to the FBI, those documents are relevant to the claims and defenses in this case and should be produced to the other parties regardless of whether they are responsive to Moog's limited document requests. However, while we appreciate Skyryse's representation that it "has not, and does not intend to, withhold any documents that have been produced to the FBI that are also responsive to any of Moog's document requests," we are hard pressed to understand how what was produced to the FBI is also not responsive to Moog's document requests. To the extent there is any gap in productions, we request that Skyryse explain the reasons for not producing such documents to Moog on or before July 27. Moog is not withholding any documents and is fully prepared to send Skyryse its production to the FBI.

Please advise whether Skyryse will agree to a mutual exchange. The same goes for the Individual Defendants.

Thank you,

Kazim

Kazim Naqvi

SheppardMullin | Los Angeles

+1 424-288-5336 | ext. 15336

From: julianne.osborne@lw.com <julianne.osborne@lw.com>

Sent: Wednesday, July 20, 2022 5:14 PM

To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; SKYRYSEMOOG.LWTEAM@lw.com; Doug.Lumish@lw.com;

Gabe.Gross@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; RFluskey@hodgsonruss.com; pmuto@hodgsonruss.com; tflynn@harrisbeach.com;

green.a@wsslip.com; truitt.a@wsslip.com

Subject: RE: Moog/Skyryse - Third Party Subpoenas

Kazim,

We write in response to your request below that the parties produce to each other all documents that they are producing or have produced to the FBI. We can confirm that Skyryse has not, and does not intend to, withhold any documents that have been produced to the FBI that are also responsive to any of Moog's document requests. Please confirm that Moog also is not withholding any such responsive documents. Since the parties have obligations to produce responsive discovery, we don't see a need for the separate agreement you proposed. Let us know if you'd like to discuss this.

Thanks,

Juli

From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Wednesday, July 20, 2022 1:36 PM

To: #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>; Lumish, Douglas (Bay Area)

<Doug.Lumish@lw.com>; Gross, Gabriel (Bay Area) <Gabe.Gross@lw.com>

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip

<LYip@sheppardmullin.com>; Fluskey Jr., Robert J. <RFluskey@hodgsonruss.com>; Muto, Pauline T.

<pmuto@hodgsonruss.com>; tflynn@harrisbeach.com; green.a@wssl.com; truitt.a@wssl.com

Subject: RE: Moog/Skyryse - Third Party Subpoenas

Counsel:

We have not heard a response on the request below that all parties produce to each other the documents that they have produced or will produce to the FBI in response to grand jury subpoenas. Please confirm.

Thank you,

Kazim

Kazim Naqvi

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From: Kazim Naqvi

Sent: Friday, July 8, 2022 7:12 PM

To: SKYRYSEMOOG.LWTEAM@lw.com; Doug.Lumish@lw.com; Gabe.Gross@lw.com

Cc: Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip

<LYip@sheppardmullin.com>; Fluskey Jr., Robert J. <RFluskey@hodgsonruss.com>; 'Muto, Pauline T.'

<pmuto@hodgsonruss.com>; tflynn@harrisbeach.com; green.a@wssl.com; truitt.a@wssl.com

Subject: Moog/Skyryse - Third Party Subpoenas

Counsel:

Enclosed are third party subpoenas for production of documents to current Skyryse employees Gonzalo Rey, Tim Baptist, Dan Gunderson, Alan Lee, and Tri Dao. We are serving these subpoenas to you because of Skyryse's stated position (including in its June 24 letter, attached) that it does not have possession, custody or control over the personal devices of its employees. Moog is entitled to discoverable and relevant information found on the personal devices of these employees, whether through Skyryse or directly from the employees themselves.

Please advise by close of business Tuesday, July 12, whether you will accept service of these subpoenas. If we do not receive confirmation, we will proceed with effectuating personal service.

Further, we understand that Skyryse and the Individual Defendants have all been served with grand jury subpoenas from the FBI requesting the production of documents. Moog has also received a grand jury subpoena for documents. We propose that all parties produce to each other the documents that they are producing or have produced to the FBI, as all such documents would be relevant to the claims and defenses in this case. Please confirm.

Thank you,

Kazim

Kazim A. Naqvi

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